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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

GENE ANTHONY BERNARD,)	Case No. 1:23-cv-00091-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	(ECF No. 14)
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from June 7, 2023 to August 7, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT . All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due to several merit briefs being due on the same week. For the weeks of June 5, 2023 and June 12, 2023, Counsel currently has 26 merit briefs, and several letter briefs and reply briefs. Counsel requires additional time to brief the issues thoroughly for

1 the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes
2 to the Defendant and Court for any inconvenience this may cause.

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4 Respectfully submitted,

5 Dated: May 24, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

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7 By: /s/ Jonathan Omar Pena
8 JONATHAN OMAR PENA
9 Attorneys for Plaintiff

10 Dated: May 24, 2023 PHILLIP A. TALBERT
11 United States Attorney
12 MATHEW W. PILE
13 Associate General Counsel
14 Office of Program Litigation
15 Social Security Administration

16 By: */s/ Justin Lane Martin
17 Justin Lane Martin
18 Special Assistant United States Attorney
19 Attorneys for Defendant
20 (*As authorized by email on May 24, 2023)
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ORDER

Based on the above stipulation (ECF No. 14), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment by no later than August 7, 2023. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **May 25, 2023**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE